

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CARLOS OCTAVIO
VLADIMIR SIMO-THEN,
Petitioner

v.

CHARLES ZEMSKI, ET AL.,
Respondents

CIVIL NO. 1:CV-00-1808

(JUDGE KANE)

FILED
HARRISBURG, PA

DEC 20 2000

MARY E. D'ANDREA, CLERK
Per Deputy Clerk

UNITED STATES DEFENDANT'S
MOTION FOR ENLARGEMENT OF TIME

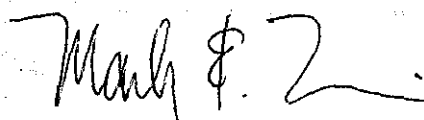
United States Respondents, by the United States Attorney's Office, request a twenty day enlargement of time in which to respond to Petitioner's Petition for Writ of Habeas Corpus. The grounds for said motion are as follows:

1. Petitioner filed, on October 12, 2000, a "Complaint for Declaratory and Injunctive Relief and Petition for Writ of Habeas Corpus".
2. On October 31, 2000, this Court issued an Order directing the Clerk of Court to serve a copy of the petition on Respondents and the United States Attorney, and directing that Respondents respond to the petition within twenty days of the date of the Order.
3. A copy of the Court's Order was not received by the United States Attorney's Office until yesterday, December 19, 2000.
4. This request for enlargement of time is filed to provide respondents with twenty days to respond to the petition, as the Court deemed by its Order.

WHEREFORE, The United States Respondents, respectfully requests this Court to grant this motion providing twenty days to respond to the petition.

Respectfully submitted,

DAVID M. BARASCH
United States Attorney

A handwritten signature in dark ink, appearing to read "Mark E. Morrison", is written over the typed name and address.

MARK E. MORRISON
Assistant U.S. Attorney
Federal Building - Room 217
228 Walnut Street
P.O. Box 11754
Harrisburg, PA 17108
(717) 221-4482

Dated: Harrisburg, Pennsylvania
December 20, 2000

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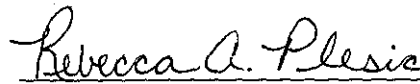
(JUDGE KANE)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion to be competent to serve papers.

On this 20th day of December, 2000, she served a copy of the foregoing document by placing said copy in a postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Harrisburg, Pennsylvania to:

Carlos O. V. Simo-Then
00-00236
Snyder County Prison
600 Old Colony Road
Slingsgrove, PA 17870


REBECCA A. PLESIC
Legal Secretary